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April 2, 2025

Re: Scarlett Pavlovich v. Neil Gaiman and Amanda Palmer
Case No. 25CV00078
The Disposition of Amanda Palmer in this Matter

Your Honor,

Pursuant to the Court's directive, we have filed proof of service on Defendant Amanda Palmer. To avoid inadvertently misleading the Court and Mr. Gaiman's counsel via that filing into believing that litigation against Ms. Palmer will proceed in this District, we are also submitting this letter.

As the Court is aware, Plaintiff initiated litigation against Ms. Palmer in each of Wisconsin, New York, and Massachusetts in order to preserve Plaintiff's claims against Ms. Palmer in light of the imminent running of any three-year statutes of limitations and uncertainty about where Ms. Palmer was subject to personal jurisdiction. After service of the Summons and Complaint in this action (and the others), Ms. Palmer's counsel informed us that Ms. Palmer intended to litigate in the District of Massachusetts and would not contest personal jurisdiction there, necessitating (and enabling) the dismissal of the claims against Ms. Palmer as filed in New York and this District. Because a second Rule 41(a) dismissal of the same claims is, by rule, with prejudice unless the defendant stipulates to the contrary, however, Plaintiff cannot simply file unilateral dismissals of the claims. We have thus asked Ms. Palmer's counsel to direct us as to in which district we should file a unilateral Rule 41 dismissal and in which district her counsel will appear for a stipulated dismissal. *See* Exhibit 1 hereto. As soon as we receive that direction, we will dismiss this action as against Ms. Palmer.

Sincerely

Dylan M. Schmeyer
KAMERMAN, UNCYK, SONIKER &
KLEIN P.C.

By: /s/ Dylan M. Schmeyer

cc: All counsel of record by electronic notice and filing